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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
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12 WAYMO, LLC,

13 Plaintiff,

14 v.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; and OTTO TRUCKING
17 LLC

18 Defendants.
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CASE NO. 3:17-CV-00939

**DECLARATION OF CHRISTOPHER
URMSON IN SUPPORT OF NON-
PARTIES CHRISTOPHER URMSON
AND AURORA INNOVATION, INC'S
MOTION TO QUASH OR MODIFY
SUBPOENA AND FOR PROTECTIVE
ORDER**

Date: TBD

Time: TBD

Courtroom: F (15th Floor)

Judge: Hon. Jacqueline Scott Corley

Trial Date: October 2, 2017

25 **REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED**
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DECLARATION OF CHRISTOPHER URMSON

I, Christopher Urmson, declare and state as follows:

1. I am the CEO and founder of Aurora Innovation, Inc. ("Aurora"), which I understand has been subpoenaed by Uber Technologies, Inc. and Ottomotto LLC (together, "Defendants") in the above-captioned litigation. The matters set forth herein are based on my personal knowledge and, if called as a witness, I could and would testify competently to the matters set forth herein.

2. As a technology company in Silicon Valley, maintaining the confidentiality of trade secret and other sensitive commercial information is critical to Aurora's success.

4. Aurora has enacted a number of mechanisms in order to maintain the secrecy of its Confidential Information. Among others, Aurora limits the number of people with access to sensitive information, maintains strict internal policies regarding confidentiality, has avoided releasing any information regarding its developments and products, and utilizes nondisclosure and similar agreements whenever confidential information must be discussed outside of the company.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Christopher Urmson